

# ALSTON & BIRD

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February 6, 2023

Jeremy A. Lieberman  
Pomerantz LLP  
600 Third Avenue  
New York, NY 10016

Re: *Patel v. Koninklijke Philips N.V., et al.*, No. 1:21-cv-04606 (ERK) (MMH) (E.D.N.Y.)

Dear Mr. Lieberman,

We write on behalf of Defendant John Frank in the above-captioned action and in accordance with Rule IV(d)(i) of the Court's individual motion practices. We enclose the following materials:

1. Defendant Frank's Notice of Motion to Dismiss the Second Amended Complaint;
2. Defendant Frank's Memorandum of Law in Support of His Motion to Dismiss the Second Amended Complaint; and
3. Declaration of Jenny Kramer in Support of Defendant Frank's Motion to Dismiss the Second Amended Complaint and exhibits thereto.

Sincerely,

/s/ Jenny Kramer

Jenny Kramer